REMARKS

By this amendment, claim 8 has been amended. Claims 1-15 are currently pending in the application, of which claims 1, 7-9, and 15 are independent claims. Applicants appreciate the indication that claims 2, 4-6, 10, and 12-14 contain allowable subject matter.

In view of the above amendments and following remarks, Applicants respectfully request reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

Claim Objection

In the Office Action, claims 2, 4-6, 10 and 12-14 were objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Applicants respectfully submit that claims 1 and 9 are allowable in view of the following remarks. Accordingly, Applicants respectfully request withdrawal of the objection for claims 2, 4-6, 10 and 12-14, which depend from allowable claims.

Rejections Under 35 U.S.C. § 112, second paragraph

Claim 8 stands rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Specifically, claim 8 stands rejected for failing to provide antecedent basis for "the second electrode" recited in claim 8.

Claim 8 has been amended to recite "a second electrode." This amendment is made for the sole purpose of clarifying claim 8. This amendment is not made for the purpose of avoiding prior art or narrowing the claimed invention, no change in claim scope is intended, and no new matter is introduced by this amendment. Therefore, Applicants do not intend to relinquish any

subject matter by this amendment. Applicants respectfully submit that claim 8, as amended, fully complies with the requirements of 35 U.S.C. § 112, second paragraph.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 112, second paragraph rejection of claim 8.

Rejections Under 35 U.S.C. § 102

Claims 1, 3, 7-9, 11, and 15 stand rejected under 35 U.S.C. § 102(b) as being allegedly anticipated by U. S. Patent No. 5,451,978 issued to Harju, *et al.* ("Harju"). Applicants respectfully traverse this rejection for at least the following reasons.

In order for a rejection under 35 U.S.C. § 102(b) to be proper, a single reference must disclose every claimed feature. To be patentable, a claim need only recite a single novel feature that is not disclosed in the cited reference. Thus, the failure of a cited reference to disclose one or more claimed features renders the 35 U.S.C. § 102(b) rejection improper.

Applicants respectfully assert that Harju fails to disclose every feature of claim 1. Claim 1 recites, *inter alia*, an image display comprising:

> a <u>plurality of transistors provided corresponding to the pixels</u> and connected between the first electrodes and a power supply voltage line for controlling the current supply to the EL elements. (emphasis added)

Harju fails to disclose <u>at least</u> this feature, as the examiner notes. The examiner correctly points out that Harju fails to disclose "a plurality of transistors provided corresponding to the pixels." Office Action, page 3, lines 18-21. Applicants concur, and submit that this fact alone is sufficient to overcome the rejection of claim 1.

Applicants note that Harju is directed to a passive matrix electroluminescence display. See, e.g., Harju, Fig. 2, Fig. 3. Thus, Harju naturally fails to disclose "a plurality of transistors provided corresponding to the pixels and connected between the first electrodes and a power

supply voltage line for controlling the current supply to the EL elements." Rather, passive matrix displays drive pixels by applying a voltage directly to a row electrode by a row driver and to a column electrode by a column driver. See, e.g., Harju, Fig. 2, Fig. 3. Transistors are not inherent in a passive matrix display.

While the examiner is correct that U.S. Patent No. 5,952,789 issued to Stewart et al. ("Stewart") and U.S. Patent No. 6,072,517 issued to Fork et al. ("Fork") disclose transistors associated with their respective pixels regions, the examiner is respectfully directed to Stewart's title ("ACTIVE MATRIX ORGANIC LIGHT EMITTING DIODE (AMOLED) DISPLAY PIXEL STRUCTURE AND DATA LOAD/ILLUMINATE CIRCUIT THEREFOR") and Fork's Abstract ("An … array includes circuitry for operating an active matrix array of organic light emitting diodes (OLEDs)"). Thus, while Stewart and Fork may provide insight into active matrix OLEDs, they offer no teachings on inherent features of passive matrix electroluminescence displays. Accordingly, for at least these reasons, Harju fails to disclose all features of claim 1.

Similarly, claim 7 recites, *inter alia*:

> a plurality of transistors provided corresponding to the pixels and connected between the first electrodes and a power supply voltage line for controlling the current supply to the EL elements.

For at least the reasons asserted above with respect to claim 1, Harju fails to disclose all features of claim 7.

Claim 1 also recites, *inter alia*:

> a display controller for using a current value fed back from the second electrode of the display panel and externally input RGB data to correct a white gray level of the RGB data and generate RGB display data,
>
> wherein the display controller determines an amount of emitted light on the corresponding screen according to the fed back current to generate a brightness control reference signal corresponding to the amount of emitted light, and controls the

> white gray level of the RGB data according to the brightness control reference signal to control the brightness of the display panel. (emphasis added)

Harju also fails to disclose at least these features. First, the examiner fails to particularly point out how Harju discloses the display controller to "to correct a white gray level of the RGB data." See, e.g., Office Action, page 3, lines 8-9. Harju discloses merely that "the luminance level of an individual pixel in each row is determined by the voltages of the columns c1-c6." Harju, col. 3, lines 26-28. No modification to RGB data is taught. Therefore, unlike the present invention, Harju fails to disclose "correct[ing] a white gray level of the RGB data."

Further, the examiner fails to particularly point out how Harju discloses the display controller to "generate a brightness control reference signal corresponding to the amount of emitted light" and instead cites to nearly two columns of Harju's specification. See, e.g., Office Action, page 3, lines 12-15. "When a reference is complex or shows or describes inventions other than that claimed by the applicant, *the particular part* relied on must be designated as nearly as practicable. The pertinence of each reference, if not apparent, *must be clearly explained* and each rejected claim specified." 37 C.F.R. § 1.104(c) (emphasis added). Applicants respectfully submit that compliance with this regulation will expedite prosecution.

Moreover, as noted above, Harju discloses that "the luminance level of an individual pixel in each row is determined by the voltages of the columns c1-c6." Harju, col. 3, lines 26-28. Thus, Harju fails to disclose that the display controller "generate[s] a brightness control reference signal." Accordingly, for at least these reasons as well, Harju fails to disclose every feature of claim 1.

Harju fails to disclose all features of claims 7-9 and 15 for at least the reasons asserted above with respect to claim 1. Claim 7 recites, *inter alia*, "current value fed back from at least one second electrode of the display panel and externally input RGB data to correct a white gray

level of the RGB data and generate RGB display data." Claim 8 recites, *inter alia*, "using a current value fed back from the second electrode of the display panel and externally input RGB data to correct a white gray level of the RGB data and generate RGB display data." Claim 9 recites, *inter alia*, "a display controller for using a current value fed back from an electrode of the display panel and externally input RGB data to correct a white gray level of the RGB data and generate RGB display data." Claim 15 recites, *inter alia*, "using a current value fed back from an electrode of a display panel and externally input RGB data to correct a white gray level of the RGB data and generate RGB display data." As asserted above for claim 1, these limitations are not disclosed by Harju.

Since none of the other prior art of record discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claims 1, 7-9, and 15, and all the claims that depend therefrom are allowable. Claim 3 depends from claim 1, and claim 11 depends from claim 9. These claims are allowable at least for their dependence from allowable base claims. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(b) rejection of claims 1, 3, 7-9, 11, and 15.

Allowable Subject Matter

Applicants appreciate the indication that claims 2, 4-6, 10, and 12-14 contain allowable subject matter, and assert that claims 2, 4-6, 10, and 12-14 are allowable for depending from claims 1 and 9, which are allowable claims. Accordingly, Applicants submit that claims 2, 4-6, 10, and 12-14 are in condition for allowance.

CONCLUSION

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

/hae-chan park/

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